

OCONEE NUCLEAR STATION

EMERGENCY PLAN

10 CFR 50.54 (g) SUMMARY OF CHANGES

ATTACHMENT 1

Part I. Description of Activity Being Reviewed (event or action, or series of actions that may result in a change to the emergency plan or affect the implementation of the emergency plan):

#	Page /Section	Current	Proposed Change
1.	Section B all pages	Rev. 2016-003 December 2016	Revision No. 2017-002 March 2017
2.	Section B page B-4	Oconee Rural Fire Association	Oconee County Emergency Services Fire/Chemical Spill
3.	Section B page B-6	12. Communications Operations Safety Assurance Training Nuclear Assurance	12. Communications Operations Organizational Effectiveness Training
4.	Section D all pages lower right	Revision No. 2017-001 March 2017	Revision No. 2017-002 March 2017
5.	Section D page D-14	Confinement Barrier	Confinement Boundary
6.	Section D p D-13(4.1.7) page D-14	OP/1,2,3/A/1502/000	OP/1,2,3/A/1502/009
7.	Section D Page D-126	<p>Basis-Related Requirements from Appendix R</p> <p>Appendix R to 10 CFR 50, states in part:</p> <p>Criterion 3 of Appendix A to this part specifies that "Structures, systems, and components important to safety shall be designed and located to minimize, consistent with other safety requirements, the probability and effect of fires and explosions."</p> <p>When considering the effects of fire, those systems associated with achieving and maintaining safe shutdown conditions assume major importance to safety because damage to them can lead to core damage resulting from loss of coolant through boil-off.</p> <p>Because fire may affect safe shutdown systems and because the loss of function of systems used to mitigate the consequences of design basis accidents under post-fire conditions does not per se impact public safety, the need to limit fire damage to systems required to achieve and maintain safe shutdown conditions is greater than the need to limit fire damage to those systems required to mitigate the consequences of design</p>	<p><i>deleted, upgraded ONS Fire Program to be fully NFPA 805 compliant</i></p>

		<p>basis accidents.</p> <p>In addition, Appendix R to 10 CFR 50, requires, among other considerations, the use of 1-hour fire barriers for the enclosure of cable and equipment and associated non-safety circuits of one redundant train (G.2.c). As used in HU4.2, the 30-minutes to verify a single alarm is well within this worst-case 1-hour time period.</p>	
8.	Section D / page D-136	<p>Once the Control Room is evacuated, the objective is to establish control of important plant equipment and maintain knowledge of important plant parameters in a timely manner. Primary emphasis should be placed on components and instruments that supply protection for and information about safety functions. Typically, these safety functions are reactivity control (ability to shutdown the reactor and maintain it shutdown), RCS inventory , and secondary heat removal .</p>	<p>Once the Control Room is evacuated, the objective is to establish control of important plant equipment and maintain knowledge of important plant parameters in a timely manner. Primary emphasis should be placed on components and instruments that supply protection for and information about safety functions. Typically, these safety functions are reactivity control (ability to shutdown the reactor and maintain it shutdown), RCS inventory (ability to cool the core), and secondary heat removal (ability to maintain a heat sink).</p>
9.	Section D / page 170 page 167	<p>If an initial manual reactor trip is unsuccessful, operators will promptly take manual action at another location(s) on the reactor control consoles to shutdown the reactor (e.g., initiate a manual reactor trip using a different switch).</p>	<p>If an initial manual reactor trip is unsuccessful, operators will promptly take manual action at another location(s) on the reactor control consoles to shutdown the reactor. Depending upon several factors, the initial or subsequent effort to manually trip the reactor, or a concurrent plant condition, may lead to the generation of an automatic reactor trip signal. If a subsequent manual or automatic trip is successful in shutting down the reactor, core heat generation will quickly fall to a level within the capabilities of the plant's decay heat removal systems.</p>
10.	Section D / page 206	<p>This threshold is based on an UNISOLABLE RCS leak that results in the inability to maintain pressurizer level within specified limits by operation of a normally used charging (makeup) pump, but an ES actuation has not occurred. The threshold is met when an operating procedure, or operating crew supervision, directs that a HPI (makeup) pump be placed in service to restore and maintain pressurizer level.</p>	<p>This threshold is based on an UNISOLABLE RCS leak that results in the inability to maintain pressurizer level within specified limits by operation of a normally used charging (makeup) pump, but an ES actuation has not occurred. The threshold is met when an operating procedure, or operating crew supervision, directs an action to restore and maintain pressurizer level due to exceeding NORMAL MAKEUP CAPABILITY.</p>
11.	Section D / page 166 page 169 page 172	<p>Note 8: A manual trip action is any operator action, or set of actions, which causes the control rods to be rapidly inserted into the core, and does</p>	<p>Note 8: A manual trip action is any Control Room operator action, or set of actions, which causes the control rods to be rapidly inserted into the core, and does not</p>

		not include manually driving in control rods or implementation of boron injection strategies.	include manually driving in control rods or implementation of boron injection strategies.
12.	Section D / page 231 page 179(SU8.1) page 191	Containment pressure > 10 psig with < one full train of containment heat removal system (1 RBS with > 700 gpm spray flow OR 2 RBCUs) operating per design for ≥ 15 min. (Note 1)	Containment pressure > 10 psig with < one full train of containment heat removal system (1 RBS with > 700 gpm spray flow AND 2 RBCUs) operating per design for ≥ 15 min. (Note 1)
13.	Section H	Rev. 2016-002 September 2016	updated to Rev 2017-002 March 2017
14.	Section H page H-4	H. EMERGENCY FACILITIES AND EQUIPMENT	<i>inserted page break to move title to top of page H-5</i>
15.	Section H page H-24 Instrument Type column	Eberline RM14	Eberline RM14 or Ludlum 177
16.	Section H page H-24 Instrument Type column	Eberline RO20	Eberline RO20 or Ludlum 9-3
17.	Section H page H-24 Instrument Type column	Eberline RO7	Eberline RO7 or Ludlum 9-7
18.	Section H page H-24 Additional Information column	Has alarm setting. Speaker indication. 50 hr operation on fully charged battery.	Has alarm setting. Speaker indication. 50 hr operation on fully charged battery. Ludlum 177 has additional scale, x 1000 = 0-500 kcpm.
19.	Section I	Rev. 2015-002 March 2015	Rev. 2017-002 March 2017
20.	Section I I-1	<u>Emergency Action Level Procedures</u> Implementing procedures to the Oconee Nuclear Station Emergency Plan have been developed. These procedures have been developed by many sections of the station. The Oconee Nuclear Station Implementing Procedures make up Volumes B and C of the station emergency plan. The Emergency Classification procedure (RP/0/A/1000/001) identifies plant parameters that can be used to determine emergency situations that require activation of the station emergency plan. NUMARC/NESP-007 (Rev. 2) which was approved by the NRC in Rev. 3 of Regulatory Guide 1.101 and subsequent guidance provided in NRC Bulletin 2005-02, the NEI guidance as endorsed in RIS 2006-12 and to support implementation of NEI 03-12 has been used as guidance.	<u>Emergency Action Level Procedures</u> Implementing procedures to the Oconee Nuclear Station Emergency Plan have been developed. These procedures have been developed by many sections of the station. The Oconee Nuclear Station Implementing Procedures make up Volumes B and C of the station emergency plan. The Emergency Classification procedure (RP/0/A/1000/001) identifies plant parameters that can be used to determine emergency situations that require activation of the station emergency plan. Revision 6 of NEI 99-01 has been issued which incorporates resolutions to numerous implementation issues including the NRC EAL Frequently Asked Questions (FAQs). Using NEI 99-01 Revision 6, "Methodology for the Development of Emergency Action Levels for Non-Passive Reactors," November 2012 (ADAMS Accession Number ML12326A805). ONS conducted an EAL implementation upgrade

		See BASIS document Section D.	project that produced the EALs, see BASIS document Section D.
21.	Section I I-3.a	<p>Source Term of Releases of Radioactive Material within Plant Systems</p> <p>Operations (Control Room Personnel) will use Enclosure 4.8 & 4.9 of RP/0/A/1000/001 to determine if radiation monitor readings will require classification. This enclosure is a simplified predetermined dose calculation for vent and in-containment radiation monitors. Operations can also get offsite dose projections from on-shift Radiation Protection technicians using procedure AD-EP-ALL-0202. AD-EP-ALL-0202 uses release paths of unit vents and the main steam relief valves. Assumptions for the calculations are based on the following:</p>	<p>Source Term of Releases of Radioactive Material within Plant Systems</p> <p>Operations (Control Room Personnel) will use the EAL Wallchart of RP/0/A/1000/001 to determine if radiation monitor readings will require classification. This enclosure is a simplified predetermined dose calculation for vent and in-containment radiation monitors. Operations can also get offsite dose projections from on-shift Radiation Protection technicians using procedure AD-EP-ALL-0202. AD-EP-ALL-0202 uses release paths of unit vents and the main steam relief valves. Assumptions for the calculations are based on the following:</p>
22.	Section P all pages	Rev. 2016-003 December 2016	Revision No. 2017-002 March 2017
23.	Section P page P-1 P.2 &P.3	The Manager of Emergency Preparedness at the Oconee Nuclear Site shall have the responsibility for the development, review and coordination of the site emergency plans with other response organizations and shall be responsible for conducting the biennial exercise, drills and training sessions to test the Oconee Nuclear Site Emergency Plan. This person is employed in the Safety Assurance Group.	The Manager of Emergency Preparedness at the Oconee Nuclear Site shall have the responsibility for the development, review and coordination of the site emergency plans with other response organizations and shall be responsible for conducting the biennial exercise, drills and training sessions to test the Oconee Nuclear Site Emergency Plan. This person is employed in the Organizational Effectiveness Group.
24.	Section P page P-16 O4.10	OCI507-N Appendix R Training	<i>deleted, ONS fully compliant with NFPA 805</i>
25.	Appendix 5 page 1	• DELETED - Dominion Nuclear Connecticut, Inc. (DNC) Superseded by letter from GO RP	<i>deleted</i>
26.	Appendix 5 page 2	• Safe Industries	<i>deleted</i>